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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE I et al. on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:23-cv-02431-VC
(Consol. w/ 3:23-cv-02343-VC)

**JOINT ADMINISTRATIVE MOTION
TO CLOSE THE COURTROOM AT
THE MARCH 22, 2024 FURTHER
CASE MANAGEMENT CONFERENCE**

Date: March 22, 2024

Time: 10:00 a.m.

District Judge Vince Chhabria
San Francisco Courthouse, Ctrm. 4

Pursuant to Civil Local Rule 7-11, Defendant Google LLC (“Google”) respectfully submits this Joint Administrative Motion to close the Courtroom during the March 22, 2024 Further Case Management Conference to the extent the Court anticipates discussing the substance of the Parties’ Joint Letter Brief re: Preservation (“Joint Letter Brief”). Plaintiffs join in making this request for relief.

Courts frequently deny public access to judicial proceedings when disclosure of confidential commercial information could “harm a litigant’s competitive standing.” *See Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978); *see also Kamakana v. City and County of Honolulu*, 447 F. 3d 1172, 1180 (9th Cir. 2006); *New York v. Microsoft Corp.*, 2002 WL 1315804 (D.D.C. 2002); *Standard & Poor’s Corp., Inc. v. Commodity Exchange, Inc.*, 541 F. Supp. 1273, 1277 (S.D.N.Y. 1982) (“the right to attend judicial proceedings should, in appropriate circumstances, give way to the right to protect one’s trade secrets”). The Court should do the same here.

The Joint Letter Brief and supporting Declaration of Miju Han were filed under seal pursuant to Civil L. R. 79-5 for the reasons stated in Google’s Unopposed Administrative Motion to Seal the Joint Letter Brief and Han Declaration re: Preservation (Dkt. 117).

The Parties anticipate that these highly confidential materials filed under seal will be discussed at the March 22, 2024 Further Case Management Conference. Those materials contain non-public, highly sensitive and confidential business information, disclosure of which could affect Google’s competitive standing and may expose Google to increased security risk. Moreover, the issues to be discussed at the Further Case Management Conference pertain only to preservation and are not necessary to the public’s understanding of the underlying dispute in this

litigation. The Parties therefore respectfully request that the Court grant this joint Motion to close the Courtroom during the March 22, 2024 Further Case Management Conference.

Dated: March 20, 2024

WILLKIE FARR & GALLAGHER LLP

By: /s/ Eduardo Santacana

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Dated: March 20, 2024

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JOHN DOE et al.

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 20, 2024

WILLKIE FARR & GALLAGHER LLP

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